**General Data Protection Regulation**

**Clearer Mind Counselling**

**Introduction. Last updated 14th January 2021.**

Your privacy is very important to Clearer Mind Counselling and you can be confident all personal information you provide will be kept safe and secure and will only be used for the purpose it was provided.

Clearer Mind Counselling adheres to data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice outlines how the personal information you provide, from initial point of contact through to therapy conclusion, is handled including:

o Why your information is processed and for what purpose
o How long it is stored for
o Who the information is shared with
o Whether it is shared outside of the European Union (EU)
o Whether automated decision-making or profiling is conducted,
o Your data protection rights

‘Data controller’ is the term used to describe the organisation that collects and stores and has responsibility for personal data. In this instance, the data controller is: Clearer Mind Counselling.

**Contact information**

Clearer Mind Counselling is contactable at:

<https://clearermindcounselling.co.uk>

cmcounselling@outlook.com



**Lawful basis for holding and using your personal information**

The GDPR states there must be a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which Clearer Mind Counselling is processing your data. These are explained below:

o If you have had therapy which has now ended, “legitimate interest” is used as the lawful basis for holding and using your personal information

o If you are currently having therapy or if you are in contact to consider therapy, your personal data will be processed where it is necessary for the performance of the contract.

o The GDPR also requires any sensitive personal information provided is appropriately handled. This type of information is called “special category personal information”. The lawful basis for processing this type of information is for provision of health treatment (in this case counselling and psychotherapy services) and necessary for a contract with a health professional (i.e. between client and therapist).

**How your information is used**

Initial contact.
Upon making initial contact to enquire about counselling services, your information will be collected in order to assist the enquiry, which includes:

“Name, telephone number, email address, GP contact, and nature of enquiry” information

Alternatively, your GP, health professional or alternative third parties may provide your details when making a referral on your behalf.

If you decide not to proceed, your personal data is deleted within NINETY DAYS. If you would prefer your information to be deleted sooner than this, please provide a written notice, see ‘contact’ tab.

While you are accessing counselling.
Rest assured that everything you discuss is confidential. Please be aware that therapists are required to undergo regular supervision, of which some details of your therapy may be discussed. Your name can be obfuscated if required, upon request.

Please note, no internet-based platform, including email, is 100% secure, so we cannot be held responsible for unauthorised or unintended access that is beyond our control. When we communicate via email, there is always the possibility that email platforms can be hacked; or email transmission may not be encrypted when corresponding back and forth. We remain mindful of this and ensure that we do everything in our capability to protect your personal information.

Confidentiality will only be broken if there is genuine cause to believe that you are of danger to yourself or others. Your therapist will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

A record of your personal details may be maintained to help the counselling services run smoothly.

Your personal information may exist within:

o Text messages
o Email
o Written notes
o Contract document

**Privacy notice**



After counselling has terminated.
Unless subject of a court order, or legal requirement, your electronic and hard copy information is deleted/shredded NINETY days after therapy services have terminated. If you would prefer your information to be deleted sooner than this, please provide a written notice, to the contact details provided above.

**Third party recipients of personal data**

Your personal information may be shared with selected third parties, for example, for the purposes of supervision. In such cases, third parties are carefully selected, and an agreement exists stating what they are allowed to do with any data shared to them. The agreement stipulates your information is not used in any way other than the task for which they have been contracted.

**Your rights**

You have a right to request your personal information be deleted; to limit how your personal information is used, or to stop processing your personal information.

You have a right to request a copy of any information held about you and to object to the use of your personal data in some circumstances. You can read more about your rights at ico.org.uk/your- data-matters.

Where personal information is held about you, you can request:

o A description of it and where it came from
o Why it us being held, and how long it will be stored for

o Who it could be disclosed to
o A copy of the information in an intelligible form
o To have any mistakes corrected

Please use the contact details provided at the top:

o To make a request for any personal information held about you
o To make a complaint about how your personal information is handled

o To provide any feedback regarding these data protection procedures

If you would like to make a formal complaint about the way your personal information is processed, you can contact the ICO which is the statutory body that oversees data protection law in
the UK. For more information go to ico.org.uk/make-a-complaint.

**Data security**
The security of all data held about you is taken very seriously and every effort is taken to ensure it is kept secure by applying a ‘defence in depth’ strategy covering physical, technical and administrative security throughout.